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February 19, 2021

**BY ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. Argemiro Zapata-Castro  
S1 18 Cr. 601 (PGG)

Dear Judge Gardephe:

I am counsel for Defendant Argemiro Zapata-Castro. After a conference held on January 20, 2021, the Court directed that by February 19, 2021, the parties advise the Court in a joint letter whether they have reached agreement concerning the firearms enhancement and, if not, how they propose to proceed. I write to respectfully request that I be afforded additional time – an additional forty-five days - to confer with my client to determine how he wishes to proceed, so we can determine whether the parties can reach common agreement on this issue. The Government consents to this request.

This request is necessitated by continued communication issues with my client necessitating additional time for me to determine how he wants to proceed. Whatever my client's final decision is on how he wishes to proceed, I wish to reduce his orally expressed desires to writing, and have them translated into Spanish, so there is no danger of miscommunication. Communication by telephone is now even more difficult because my client is in a lockdown on account of the Pandemic. Accordingly, the parties will report to the Court in a joint letter how we propose to proceed no later than April 6, 2021.

I thank the Court for its consideration of this request.

Respectfully submitted,



Scott B. Tulman

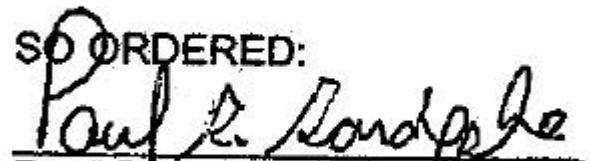
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cc: Matthew Hellman, Esq., AUSA

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
**Paul G. Gardephe, U.S.D.J.**

**Dated:** February 22, 2021